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**STERN & SCHURIN LLP**  
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**VIA ECF**

Hon. Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

Plaintiff's letter-motion (ECF No. 125) requesting leave to file documents under seal is DENIED without prejudice. Plaintiff may renew its request by filing the documents preliminarily under seal and the Court will rule on whether to permit the documents to remain under seal.

The Clerk of Court is respectfully directed to close ECF No. 125.

SO ORDERED. 6/12/2023

  
SARAH L. CAVE  
United States Magistrate Judge

Re: *Primed Pharmaceuticals LLC v. Starr Indemnity & Liability Co.*  
21-cv-1025 (SLC)

Dear Judge Cave,

This firm represents Plaintiff Primed Pharmaceuticals, LLC ("Primed") We write this letter pursuant to Your Honors Individual Practices in Civil Cases I.G.2 and in accordance with the Protective Order entered on June 30, 2021 to request that the Court permit Primed to file exhibits previously marked Confidential under seal in support of its recently filed motion for damages. (Dkt. No. 119) We requested Defendant Starr Indemnity's consent to this motion on June 2, 2023, but its counsel has not responded.

Primed respectfully submits that good cause exists for this request on the following grounds:

The Protective Order entered in this case, i.e., Dkt No. 29, states in paragraph 1 that:

"[P]roprietary or non-public information of a commercially, financially or personally sensitive nature such as confidential trade secrets, unpublished financial data, confidential business or products plans, or confidential customer information" that would pose a high risk of competitive harm, may be identified as CONFIDENTIAL or AEO/ATTORNEYS' EYES ONLY-HIGHLY CONFIDENTIAL.

The Protective Order further states at paragraph 9 that:

All Confidential Information filed with the Court, and all portions of pleadings, motions or other papers filed with the Court that disclose such Confidential Information shall be filed under seal to the extent permitted by law (including, without limitation any applicable rules of court).

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United States Magistrate Judge  
June 9, 2023  
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As such, we respectfully request permission to file Exhibits 1 through 5 to Primed's motion for damages under seal. These documents have all been marked either Confidential or AEO-Attorneys Eyes Only in this case.

Exhibit 1 is an engagement agreement between Primed and its counsel that contains sensitive financial and proprietary information relative to the underlying Abbott Litigation, which remains ongoing.

Exhibit 2 is an invoice from Primed's counsel that contains billing entries which reveals strategy in the underlying Abbott Litigation, and communications between Primed and its counsel.

Exhibit 3 is a second engagement which again contains sensitive financial and proprietary information relative to the underlying Abbott Litigation.

Exhibit 4 are invoices from Primed counsel that disclose financial information relative to the underlying Abbott Litigation.

Exhibit 5 is an "Accounts Payable Payment History," generated from Primed's business software which contains sensitive financial information.

Primed respectfully requests that the Court permit it to file Exhibit 1 – 5 under seal in association with the previously filed Motion for Damages.

Respectfully submitted,  
**STERN & SCHURIN LLP**

*Richard S. Schurin*  
Richard S. Schurin